

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA,)
)
v.) NO. 3:13-cr-130
)
JEFFREY HARGIS.) Judge Trauger

DEFENDANT'S MOTION TO CONTINUE TRIAL

The Defendant, Jeffrey Hargis, by and through counsel hereby moves this Honorable Court to continue the trial set for April 8, 2014. Mr. Hargis would suggest a continuance of sixty (60) days. In support of this motion, the Defendant would state as follows:

1. The undersigned was appointed to represent Jeffrey Hargis.
2. The Defendant has had settlement discussions with the Government. At this time settlement discussions are ongoing and have been productive. The Defendant believes that the parties are close to reaching an agreement.
3. The Defendant will file his Waiver of speedy trial rights this evening or on April 1, 2014.
4. The undersigned has discussed this request with Assistant United States Attorney, Brent Hannafan and the Government does not oppose the granting of this Motion.
5. The instant request is made in good faith and in an effort to provide constitutionally effective assistance of counsel and is not intended to unnecessarily delay the proceedings. The requested continuance will afford the parties an opportunity to determine if the matter can be resolved short of pretrial litigation and a jury trial.

WHEREFORE PREMISES CONSIDERED, the Defendant moves this Court for a sixty (60) day continuance of the jury trial set for April 8, 2013 and an extension of time to file pre-trial